

ATTACHMENT A
AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT AND ARREST WARRANT

I, Darron N. Craft being duly sworn, hereby state:

I am a Special Agent with the United States Secret Service, having been so employed for 15 years. I am currently assigned to the Shreveport Domicile, working under the Baton Rouge Resident Office. During the course of my experience, I have worked numerous counterfeit check cases in violation of 18 U.S.C § 513.

This affidavit was prepared in support of an arrest warrant for DION PAUL BARNES (AKA – DOUGLAS M. BARNES), DOB 12-02-1977, SSAN XXX-XX-8712. The information contained in this document was obtained through direct investigation conducted by the United States Secret Service and the Louisiana State Police.

On 06/10/15, while patrolling Louisiana Highway 2 Westbound in Ouachita Parish, La, Master Trooper Harvey Bonner, Louisiana State Police (LSP) Troop F, observed a white, two door Chevrolet Camaro traveling Westbound on La. Hwy 2 in front of his motorcycle unit. M/T Bonner noticed that the vehicle had an unusual temporary tag and was about to call it into the troop when the Camaro accelerated rapidly. M/T Bonner accelerated with the Camaro in an effort to make a traffic stop. M/T Bonner was on his LSP motorcycle and paced the Camaro at 90 MPH in a 45 MPH zone. M/T Bonner activated his emergency lights, but the driver of the car was not stopping. As the Camaro approached other traffic, it had to slow down and then pulled into the Valero station parking lot on La. Hwy 2 and High Street. M/T Bonner made contact with the driver of the vehicle, and was presented a Florida driver's license in the name of Douglas M. Barnes (B/M, 11/27/67, Florida DL # B250-541-69-013-0). M/T Bonner explained to Mr. Barnes the reason for the stop. Mr. Barnes was wearing an ID card around his neck with the name of Terelle Rios, from Occupational Medicine Consultants. M/T Bonner asked Mr. Barnes if Rios was his real name, at which point he stated that this was his brother's name who had passed away last May and he wears it in remembrance of him.

M/T Bonner ran the Florida driver's license through dispatch at Troop F. The license came back not on file. M/T Bonner noticed that the Florida license was counterfeit due to the location of magnetic strip on the back of the card and the city of Miami Gardens, FL actually being spelled Miami Gargens, FL. M/T Bonner questioned Mr. Barnes about the vehicle, and he told him that he bought it in February in Chicago. When asked for the vehicle registration, Mr. Barnes opened the trunk of the vehicle and searched through one of the duffle bags. However, he was unable to locate the registration for the car. M/T Bonner ran the VIN number of the car and it came back

stolen out of Milwaukee, WI, from Enterprise Car Rental. Rob Nenahlo, Enterprise Rental Car, verified that the car was reported stolen in November 2014. Next, M/T Bonner ran the temporary tag on the car through LSP dispatch. The temporary tag, Illinois 899R802, came back to a 1990 Chevrolet Cavalier. M/T Bonner placed Mr. Barnes under arrest for possession of stolen things, and searched him. M/T Bonner located a Waffle House paycheck in Mr. Barnes' left rear pocket made out to Maria Turner. In addition to Mr. Barnes driving the vehicle, M/T Bonner also made contact with two passengers. The passengers were identified as Barbara Island (3/2/84), and April Augustine (5/26/81). M/T Bonner ran a warrant check on Ms. Island and Ms. Augustine which met with negative results. M/T Bonner released Island and Augustine on the scene.

At this point, M/T Bonner and Trooper James Olmstead, LSP Troop F, transported the Camaro and Mr. Barnes to Troop F for further investigation. Upon arrival at Troop F, M/T Bonner inventoried the vehicle with Department of Public Safety Officer Steve Prine. In the trunk of the Camaro, M/T Bonner located a large duffle bag that contained a large stack of blank check stock paper. Two laptop computers and Three computer tablets were found along with an HP Deskjet 2542 Print/Scan/Copy machine. In a separate duffle bag, M/T Bonner found a large amount of payroll checks from the Waffle House, Dollar General and McDonalds. The amounts of the checks ranged from \$250.00 to \$350.00. Also found were men's shirts with business logos from McDonalds, Huddle House, KFC, Shell, Kroger, Motel 6, Family Dollar, Waffle House, Burger King and Dollar General. Name plates from Burger King, Motel 6, KFC, Kroger, McDonalds, Family Dollar and Dollar General were found with either the name of "Chris" or "Chris Singleton" on them. M/T Bonner booked Mr. Barnes into the Ouachita Correctional Center in Richwood, LA and turned over further investigation to the United States Secret Service and LSP Region 3 Bureau of Investigations.

On 06/11/15, I responded to the LSP Detectives office in Monroe, LA to review the evidence that was seized pursuant to the arrest of Mr. Barnes. During my review of the evidence, I verified that there were forty-nine (49) counterfeit checks. Forty-eight (48) of the counterfeit checks showed to be drawn on Regions Bank, and one (1) check showed to be drawn on US Bank. The payee of the counterfeit checks were shown to be McDonalds (four checks), Waffle House (six checks), and Dollar General (thirty-nine checks). A review of the bank routing numbers revealed that there were three (3) different routing numbers for all the checks. Routing numbers 082907888 and 082906494 are related to Simmons First National Bank in Pine Bluff, Arkansas. The four counterfeit McDonalds checks showed routing number 082907888 and account number 0269026. Two of these checks were made payable to Christopher Singleton and two were made payable to Barbara Island. The six counterfeit Waffle House checks showed a routing number 082906494 and account number 6205968. Five of these checks were made payable to Barbara Island while one check was made

payable to a Maria Turner. The third, and final routing number, was 082000073. This routing number is related to Bank of America. There were thirty-nine (39) counterfeit Dollar General checks showing this routing number with account number 487001593265. All thirty-nine counterfeit checks were made payable to Christopher Singleton.

In addition to the counterfeit checks, I reviewed the blank check stock and HP Deskjet 2542 that was located in the Camaro. The blank check stock located in the duffle bag matches the check stock utilized to manufacture the counterfeit checks found in the possession of Mr. Barnes. It is my professional opinion based on years of investigating counterfeit check cases, that Mr. Barnes was utilizing the HP Deskjet 2542 to manufacture the counterfeit checks. In addition to the blank check stock and HP Deskjet printer, Mr. Barnes was in possession of six (6) cell phones, three (3) tablets, two (2) laptop computers, and multiple shirts with business logos on them. This type of activity is consistent with the manufacturing and passing of counterfeit checks.

On 06/11/15, I, along with Investigator Hank Smith (LSP), and Investigator Jerry Spencer (LSP) attempted to interview Mr. Barnes at the Ouachita Correctional Center. Mr. Barnes indicated to me that he would not answer questions relating to his arrest without a lawyer being present.

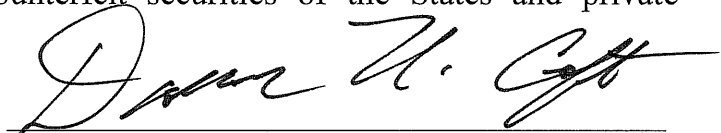
On 06/12/15, I made contact with Leslie Camp of Simmons First National Bank in Pine Bluff, Arkansas. Camp informed me that routing numbers 082907888 and 082906494 were assigned to their bank. Camp also informed me that account number 0269026 is an active bank account number associated with IHOP, and account number 6205968 is an active bank account number associated with Wendy's. Camp further informed me that their bank has been receiving several counterfeit checks with the payee's being Barbara Island and April Augustine.

Continuing on 06/12/15, I made contact with Francis Chancellor, Corporate Security for Bank of America. Chancellor informed me that routing number 082000073 is assigned to Bank of America, and account number 487001593265 is an active open account out of Florida. Chancellor verified that the checks in our possession do not match their account holder information and are counterfeit.

A query of the United State Secret Service database revealed that Mr. Barnes was arrested by this service in July 2006 for violation of 18 U.S.C. § 1344 (Bank Fraud) and 18 U.S.C. § 513 (Passing Counterfeit Securities of the State and Private Entities) pursuant to a federal grand jury indictment in Lexington, Kentucky. Mr. Barnes established bank accounts under the aliases of Kevellis Cassinelli, Tyreese D. Mayfield, Christopher Barnes, Tyrelle Carradine, and C. Derria Barnes and then deposited counterfeit business checks into those accounts. Mr. Barnes caused an

extensive loss to banks spread throughout Kentucky, Arkansas, Oklahoma and Illinois. Mr. Barnes subsequently pled guilty to these charges and was sentenced to forty-one (41) months in the custody of the Bureau of Prisons, three (3) years supervised release, and ordered to pay restitution in the amount of \$68,917.00. After being released, Mr. Barnes had his supervised release revoked and was sent back to the Bureau of Prisons for another twenty-one (21) months after being arrested on or about August 15, 2008 in Villa Rica, GA for Forgery, 1st Degree.

Based on the above, I have probable cause to believe that Dion Paul Barnes aka Douglas M. Barnes committed a violation of 18 U.S.C. § 513 (i.e., the offense of making, possessing and uttering counterfeit securities of the States and private entities).



DARRON N. CRAFT

Special Agent – U.S. Secret Service

Sworn to and subscribed in my presence this 16th day of June, 2015.



Karen L. Hayes

United States Magistrate Judge